ORIGINAL

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

SEALED - v. -INDICTMENT

RAYSHAWN BARNES, S1 15 Cr. 288 (RMB) a/k/a "Twerk,"

ALEXANDER FINLEY.

a/k/a "A," a/k/a "Abe,"

EMMANUEL MCKENZIE,

a/k/a "Bliz," a/k/a "Bills,"

a/k/a "Manny Fresh,"

TRAVIS HENRY,

a/k/a "Barker"

a/k/a "Migo,"

EVERAL MCLAGGON, a/k/a "Doghouse,"

a/k/a "Max,"

ARSENIO MILLER,

a/k/a "Mayno,"

JERMAINE MITCHELL,

a/k/a "Jerry,"

OMAR SHARPE,

a/k/a "Dummy,"

a/k/a "Dumbshit,"

KEMANI CAMPBELL,

a/k/a "Bibby,"

a/k/a "Juice,"

ALEX CHRISTIE,

a/k/a "Denimz,"

a/k/a "A1,"

SEAN JOHNSON

a/k/a "Dutty"

PETER BLAIR

a/k/a "Twin"

a/k/a "Drilla"

ENIKO WILSON,

a/k/a "Bigz,"

a/k/a "Akeem,"

TASHANE BENJAMIN

a/k/a "Walla"

SHAWN WILLIAMS,

a/k/a "Fry Eye,"

USUC SDNY DOCUMENT ELECTRONICALLY FILED DOC#:

DATE FILED: 11/23/15

:

a/k/a "Flyers,"
ODAINE JOHNSON,
 a/k/a "Flocka"
VANDERMME MCDONALD,
 a/k/a "Van Dam,"
 a/k/a "Tommy Lee,"

FABIAN WILLIAMS,
JAVARRE BROWN,
 a/k/a "Choppy," and
JAMAR DAVIDSON,
 a/k/a "Smoove"
:

Defendants.

COUNT ONE

The Grand Jury charges:

November 2015, in the Southern District of New York and elsewhere, RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Bigz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flyers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON,

a/k/a "Smoove," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

- It was a part and an object of the conspiracy that RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Bigz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flvers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON, a/k/a "Smoove," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1).
- 3. The controlled substances that RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL

MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Biqz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flyers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON, a/k/a "Smoove," the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute were: (a) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); and (b) 100 kilograms and more of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 18, United States Code, Section 846.)

MEANS AND METHODS OF THE CONSPIRACY

4. At all times relevant to this Indictment, a criminal drug-trafficking organization (the "213 DTO") controlled narcotics trafficking in the approximate area bounded by East

213th and East 215th Streets, and Barnes Avenue and White Plains Road, in the Bronx, New York (the "213 Box"). Members and associates of the 213 DTO sold crack cocaine and marijuana, among other illegal narcotics, within the 213 Box, and prevented others from doing the same by the threat of violence.

5. New York City Police Department analysis describes the 213 Box — and in particular a building in the vicinity of East 213th Street and Barnes Avenue referred to by members of the 213 DTO as the "Bando" — as an epicenter of violence in the neighborhood. Since 2011, the violence in that general area includes at least 35 shootings, of which 22 were fatal, as well as over 500 reports of shots fired and at least one non-shooting homicide. The 213 DTO's operations are a major source of crime and violence in the area surrounding the 213 Box.

OVERT ACTS

- 6. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about November 20, 2014, RAYSHAWN BARNES, a/k/a "Twerk," the defendant, possessed quantities of crack cocaine and marijuana packaged for retail sale in the vicinity of East 216th Street in the Bronx, New York.
 - b. On or about May 16, 2015, JERMAINE MITCHELL,

a/k/a "Jerry," the defendant, possessed a loaded firearm and approximately two pounds of marijuana in the vicinity of East 213th Street and Barnes Avenue in the Bronx, New York.

- c. In or about 2014, OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," the defendant, purchased wholesale quantities of crack cocaine from a cooperating witness ("CW-1") in the Bronx, New York.
- d. On or about June 9, 2015, KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," the defendant, sold a quantity of crack cocaine to a confidential informant ("CI-1") in the vicinity of East 213th Street and Barnes Avenue in the Bronx, New York.
- e. On or about June 25, 2015, ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," the defendant, exchanged a telephone call with CAMPBELL in which CHRISTIE agreed to sell CAMPBELL a quantity of marijuana in the Bronx, New York.
- f. On or about September 28, 2015, SEAN JOHNSON, a/k/a "Dutty," the defendant, sold a quantity of crack cocaine to a confidential informant ("CI-2") in the vicinity of East 215th Street in the Bronx, New York.
- g. On or about August 27, 2015, PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," the defendant, sold a quantity of crack cocaine to CI-2 in the vicinity of East 215th Street in the Bronx, New York.
 - h. On or about August 31, 2015, ENIKO WILSON, a/k/a

"Bigz," a/k/a "Akeem," the defendant, exchanged a telephone call with EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," the defendant, during which WILSON arranged to supply MCKENZIE with a wholesale quantity of crack cocaine in the Bronx, New York.

- i. On or about March 20, 2015, TASHANE BENJAMIN, a/k/a "Walla," the defendant, possessed a quantity of crack cocaine in the vicinity of East 239th Street in the Bronx, New York.
- j. On or about July 22, 2015, SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flyers," the defendant, sold a quantity of crack cocaine to CI-1 in the vicinity of East 213th Street and Barnes Avenue in the Bronx, New York.
- k. In or about 2014, ODAINE JOHNSON, a/k/a "Flocka," the defendant, purchased wholesale quantities of crack cocaine from CW-1 in the Bronx, New York.
- 1. On or about July 21, 2015, VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," the defendant, sold a quantity of crack cocaine to CI-1 in the vicinity of East 213th Street and Barnes Avenue in the Bronx, New York.
- m. On or about October 20, 2015, FABIAN WILLIAMS, the defendant, sold a quantity of marijuana to CI-1 in the vicinity of East 213th Street and Barnes Avenue in the Bronx, New York.

- n. On or about June 25, 2015, JAVARRE BROWN, a/k/a "Choppy," the defendant, engaged in a telephone conversation with CAMPBELL during which BROWN agreed to provide marijuana to CAMPBELL in the Bronx, New York.
- o. On or about April 30, 2015, JAMAR DAVIDSON, a/k/a "Smoove," the defendant, possessed a wholesale quantity of marijuana in the vicinity of East 221st Street in the Bronx, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

7. From in or about 2013 up to and including in or about November 2015, in the Southern District of New York and elsewhere, RAYSHAWN BARNES, a/k/a "Twerk," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," JERMAINE MITCHELL, a/k/a "Jerry," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "Al," and PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Section 924(c)(1)(A).)

FORFEITURE ALLEGATION

As a result of committing the controlled substance 8. offense charged in Count One of this Indictment, RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Bigz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flyers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON, a/k/a "Smoove," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

Substitute Assets Provision

- 9. If any of the above-described forfeitable property, as a result of any act or omission of RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," and ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Bigz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye," a/k/a "Flyers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Van Dam," a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON, a/k/a "Smoove," the defendants:
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

FOREPERSON

PREET BHARARA

United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAYSHAWN BARNES, a/k/a "Twerk," ALEXANDER FINLEY, a/k/a "A," a/k/a "Abe," EMMANUEL MCKENZIE, a/k/a "Bliz," a/k/a "Bills," a/k/a "Manny Fresh," TRAVIS HENRY, a/k/a "Barker," a/k/a "Migo," EVERAL MCLAGGON, a/k/a "Doghouse," a/k/a "Max," and ARSENIO MILLER, a/k/a "Mayno," JERMAINE MITCHELL, a/k/a "Jerry," OMAR SHARPE, a/k/a "Dummy," a/k/a "Dumbshit," KEMANI CAMPBELL, a/k/a "Bibby," a/k/a "Juice," ALEX CHRISTIE, a/k/a "Denimz," a/k/a "A1," SEAN JOHNSON, a/k/a "Dutty," PETER BLAIR, a/k/a "Twin," a/k/a "Drilla," ENIKO WILSON, a/k/a "Bigz," a/k/a "Akeem," TASHANE BENJAMIN, a/k/a "Walla," SHAWN WILLIAMS, a/k/a "Fry Eye, " a/k/a "Flyers," ODAINE JOHNSON, a/k/a "Flocka," VANDERMME MCDONALD, a/k/a "Tommy Lee," FABIAN WILLIAMS, JAVARRE BROWN, a/k/a "Choppy," and JAMAR DAVIDSON, a/k/a "Smoove," Defendants.

INDICTMENT

S1 15 Cr. 288 (RMB)

(18 U.S.C. §§ 924(c)(1)(A) and 2; 21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.

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